

**From:** Joshua Tom <JTom@aclu-ms.org>  
**Sent:** Tuesday, October 3, 2023 4:46 PM  
**To:** Ryan Beckett  
**Cc:** Tommie Cardin; Parker Berry; Rex Shannon; Cindy Grantham; 'Mike Wallace'; Charles Cowan; 'Esterkin, Jeremy B.'; erosenberg@lawyerscommittee.org; jnwachukwu@lawyerscommittee.org; David Rollins-Boyd; Ari Savitzky; Ming Cheung; Robert B. McDuff; Carroll Rhodes; Lavelle, Jr., John P.; Jordan, Drew Cleary; Bhamdeo, Benjamin; Antonellis, Celina  
**Subject:** MS NAACP v. SBEC - Plaintiffs' privilege logs  
**Attachments:** MS NAACP Privilege Log FINAL.xlsx; Gary Fredericks Privilege Log FINAL.xlsx; Pam Hamner Privilege Log FINAL.xlsx; Andrea Wesley Privilege Log FINAL.xlsx; Joseph Wesley Privilege Log FINAL.xlsx; Barbara Finn Privilege Log FINAL.xlsx

Dear Ryan:

Please find attached privilege logs from Plaintiffs The Mississippi State Conference of the NAACP, Gary Fredericks, Pam Hamner, Andrea Wesley, Joseph Wesley, and Barbara Finn.

All the best,

Josh

**Joshua F. Tom**

Pronouns: he/him/his

Legal Director

American Civil Liberties Union of Mississippi

101 South Congress St., Jackson, MS 39201

601.354.3408 ext. 112 | [jtom@aclu-ms.org](mailto:jtom@aclu-ms.org)

[aclums.org](https://aclums.org)   



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Begin Bates	End Bates	Date	Attachment	Filename/Subje ct	Author / From	To / Recipients	CC	BCC	Document Type	Privilege Basis	Privilege Description
MSNAACP_0000016	MSNAACP_0000016	8/2/2023	No	Privileged Discovery Responses in MS Legislative Redistricting	Ari Savitzky	Plaintiffs and Co- Counsel			Email	Attorney Client Privilege	Confidential communication between counsel and plaintiffs with counsel providing legal advice as to redistricting litigation discovery requests
MSNAACP_0000017	MSNAACP_0000017	3/21/2023	No	Hold Notice for MS NAACP	Ari Savitzky	Plaintiffs and Co- Counsel			Email	Attorney Client Privilege	Confidential communication between counsel and plaintiffs with counsel providing legal advice as to appropriate litigation holds
MSNAACP_0000018	MSNAACP_0000018	2/14/2023	Yes	MS State Legislative Districts - Identifying	Ari Savitzky	Plaintiffs and Co- Counsel			Email	Attorney Client Privilege	Confidential communication between counsel and plaintiffs with counsel providing legal advice as to how lawsuit affects clients' members
MSNAACP_0000019	MSNAACP_0000019	2/14/2023	Attachment to "MS State Legislative Districts - Identifying affected voters"	2.14 MS Leg Districts Voter Search Memo - Confidential	Ari Savitzky	Plaintiffs and Co- Counsel			Email	Attorney Client Privilege	Confidential communication between counsel and plaintiffs with counsel providing legal advice as to how lawsuit affects clients' members
MSNAACP_0000020	MSNAACP_0000020	NO DATE	No	Mississippi State Legislature - Close-to-Final Complaint for NAACP Review	Ari Savitzky	Plaintiffs and Co- Counsel			Email	Attorney Client Privilege	Confidential communication between counsel and plaintiffs with counsel providing a draft complaint
MSNAACP_0000021	MSNAACP_0000021	12/13/2022	No	MS State Leg Filing - Communications	Ari Savitzky	Plaintiffs and Co- Counsel			Email	Attorney Client Privilege	Confidential communication between counsel and plaintiffs with counsel providing a draft complaint
MSNAACP_0000022	MSNAACP_0000022	11/15/2022	No	Redistricting Case: Template for reaching out to NAACP	Ari Savitzky	Plaintiffs and Co- Counsel			Email	Attorney Client Privilege and First Amendment / Associational Privilege	Confidential communication between counsel and plaintiffs with counsel providing legal advice as to how lawsuit affects clients' members. Also involves internal strategic communications protected by the First Amendment.
MSNAACP_0000023	MSNAACP_0000023	NO DATE	No	State Legislative Districting Matter	Ari Savitzky	Plaintiffs and Co- Counsel			Email	Attorney Client Privilege	Confidential communication between counsel and plaintiffs with counsel providing legal advice as to how lawsuit affects clients' members and discussing retainer agreement
MSNAACP_0000024	MSNAACP_0000024	10/6/2022	Yes	Engagement Letter from Rev James	Ari Savitzky	Plaintiffs and Co- Counsel			Email	Attorney Client Privilege	Confidential communication between counsel and plaintiffs with counsel providing legal advice as to how lawsuit affects clients' members and discussing retainer agreement
MSNAACP_0000025	MSNAACP_0000025	10/6/2022	Attachment to "Engagement Letter from Rev James"	221006_ACLU, ACLU MS, NAACP Engagement (fully executed)	Ari Savitzky	Plaintiffs and Co- Counsel			Email	Attorney Client Privilege	Confidential communication between counsel and plaintiffs with counsel providing legal advice as to how lawsuit affects clients' members and discussing retainer agreement
MSNAACP_0000026	MSNAACP_0000026	3/15/2022	Yes	Legislative Redistricting Challenge -	Ari Savitzky	Plaintiffs and Co- Counsel			Email	Attorney Client Privilege	Confidential communication between counsel and plaintiffs discussing retainer agreement review
MSNAACP_0000027	MSNAACP_0000027	3/15/2022	Attachment to Potential State Legislative Redistricting Challenge -	Engagement Agreement	Ari Savitzky	Plaintiffs and Co- Counsel			Email	Attorney Client Privilege	Confidential communication between counsel and plaintiffs discussing retainer agreement review
MSNAACP_0000028	MSNAACP_0000028	3/4/2023	No	Mississippi Legislative Redistricting Case	Carroll Rhodes	NAACP Board Members			Email	Attorney Client Privilege and First Amendment / Associational Privilege	Confidential internal strategic communication sent by counsel regarding MS NAACP's advocacy and litigation strategy related to redistricting, including copy of litigation documents as protected by the First Amendment and the attorney client privilege.

MSNAACP_0000029	MSNAACP_0000029	3/28/2022	Yes	Analysis of Proposed MS Legislative Maps	Charles Taylor	NAACP leadership and staff, consultants, counsel, and members involved in the redistricting			Email	Attorney Client Privilege and First Amendment / Associational Privilege	Confidential communication between NAACP leadership and staff, consultants, counsel, and members involved in the redistricting process regarding advocacy activities and strategy, including potential litigation strategy, with respect to redistricting in exercise of First Amendment speech and associational rights.
MSNAACP_0000030	MSNAACP_0000030	3/28/2022		Attachment to "Analysis of Proposed MS Legislative Maps"	Charles Taylor	and staff, consultants, counsel, and members involved in the redistricting process			Email	Attorney Client Privilege and First Amendment / Associational Privilege	Confidential communication between NAACP leadership and staff, consultants, counsel, and members involved in the redistricting process regarding advocacy activities and strategy, including potential litigation strategy, with respect to redistricting in exercise of First Amendment speech and associational rights.
MSNAACP_0000031	MSNAACP_0000031	8/5/2022	No	FWD: MS NAACP	Jarvis Dortch	Charles Taylor			Email	Attorney Client Privilege	Confidential communication between counsel, plaintiffs, and staff of plaintiff organizations discussing retainer agreement
MSNAACP_0000032	MSNAACP_0000032	9/13/2022	Yes	MS NAACP State Leg Redistricting Engagement Letter Updated	Ari Savitzky	Charles Taylor	NAACP Board Members		Email	Attorney Client Privilege	Confidential communication between counsel, plaintiffs, and staff of plaintiff organizations discussing retainer agreement
MSNAACP_0000033	MSNAACP_0000033	9/13/2022		NAACP State Leg Redistricting Engagement Letter Updated 9.13"	Ari Savitzky	Charles Taylor	NAACP Board Members		Email	Attorney Client Privilege	Confidential communication between counsel, plaintiffs, and staff of plaintiff organizations discussing retainer agreement
MSNAACP_0000034	MSNAACP_0000034	7/13/2022	Yes		Matters to Mississippians Article Edits and New Version	Brenda Hyde	NAACP Board Members and strategic partners		Email	First Amendment / Associational Privilege	Confidential communication between MS NAACP and strategic partners regarding joint advocacy activities and strategy with respect to redistricting in exercise of First Amendment speech and associational rights.
MSNAACP_0000035	MSNAACP_0000035	7/13/2022		Attachment to "Why Redistricting Matters to Mississippians Article Edits and New Version"	Brenda Hyde	NAACP Board Members and strategic partners			Email	First Amendment / Associational Privilege	Confidential communication between MS NAACP and strategic partners regarding joint advocacy activities and strategy with respect to redistricting in exercise of First Amendment speech and associational rights.
MSNAACP_0000036	MSNAACP_0000036	5/27/2022	No		Redistricting Messaging	Aisha Carson	Charles Taylor		Email	First Amendment / Associational Privilege	regarding joint advocacy activities and strategy with respect to redistricting in exercise of First Amendment speech and associational rights.
MSNAACP_0000037	MSNAACP_0000037	3/15/2022	No		Potential State Legislative Redistricting Challenge -	Jarvis Dortch	Ari Savitzky, Charles Taylor		Email	Attorney Client Privilege	Confidential communication between counsel, plaintiffs, and staff for plaintiffs discussing retainer agreement and possible representation
MSNAACP_0000038	MSNAACP_0000038	NO DATE	No		USM Public Hearing Statement	MS NAACP			PDF	First Amendment / Associational Privilege	Internal strategic communication regarding draft of MS NAACP's planned communications regarding redistricting in exercise of First Amendment speech and associational rights.

Begin Bates	Date	Attachment	Filename/Subject	Author / From	To / Recipients	CC	BCC	Document Type	Privilege Basis	Privilege Description
FredericksG_0000022	1/9/2023	No	MS Redistricting - data protection	Gary Fredericks	Strategic partners(s)			Email	First Amendment Privilege / Attorney Client Privilege	Confidential communication regarding the associational plans or strategies of Plaintiff and allied association(s) regarding redistricting. The document also contains confidential communications with counsel providing legal advice as to document retention.
FredericksG_0000023	11/15/2022	No	State legislative redistricting	Gary Fredericks	Strategic partners(s)			Email	First Amendment Privilege / Attorney Client Privilege	Confidential communication regarding the associational plans or strategies of Plaintiff and allied association(s) regarding redistricting. The document also contains confidential communications with counsel providing legal advice as to document retention.
FredericksG_0000021	2/1/2021	No	Harrison County Redistricting	Strategic Partner	Gary Fredericks; Strategic partners(s)			Email	First Amendment Privilege	Confidential communication regarding the associational plans or strategies of Plaintiff and allied association(s) regarding redistricting.

Begin Bates	Date	Attachment	Filename/ Subject	Author / From	To / Recipients	CC	BCC	Document Type	Privilege Basis	Privilege Description
HamnerP_0000029	4/10/2023	No	Timeline for Redistricting	Pam Hamner	Strategic Partner(s)			Email	First Amendment	Confidential communication regarding the associational plans or strategies of Plaintiff and allied association(s) regarding redistricting.
HamnerP_0000026	8/3/2023	No	Redistricting Desoto County 2021	Pam Hamner	Counsel			Email	Attorney Client Privilege	Confidential communication between counsel and plaintiff about discovery request

Begin Bates	End Bates	Date	Attachment	Filename/Subject	Custodian	Author / From	To / Recipients	CC	BCC	Document Type	Privilege Basis	Privilege Description
WesleyA_0000002	WesleyA_0000003	7/29/2021	No	7.29.2021 Political Action Committee Report	Andrea Wesley					PDF	First Amendment Privilege	Confidential communication regarding the associational plans or strategies of the MS NAACP Plaintiffs and allied associations regarding redistricting and voting in MS.
WesleyA_0000004	WesleyA_0000005	8/12/2021	No	8.12.2021 Political Action Committee Report	Andrea Wesley					PDF	First Amendment Privilege	Confidential communication regarding the associational plans or strategies of the MS NAACP Plaintiffs and allied associations regarding redistricting and voting in MS.

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WesleyJ_0000002	WesleyJ_0000003	7/29/2021	No	7.29.2021 Political Action Committee Report	Joseph Wesley					PDF	First Amendment Privilege	Confidential communication regarding the associational plans or strategies of the MS NAACP Plaintiffs and allied associations regarding redistricting and voting in MS.
WesleyJ_0000004	WesleyJ_0000005	8/12/2021	No	8.12.2021 Political Action Committee Report	Joseph Wesley					PDF	First Amendment Privilege	Confidential communication regarding the associational plans or strategies of the MS NAACP Plaintiffs and allied associations regarding redistricting and voting in MS.

Begin Bates	Date	Attachment	Filename/Subject	Author / From	To / Recipients	CC	BCC	Document Type	Privilege Basis	Privilege Description
FinnB_0000001	8/12/2023	Yes	Revised Report from the Political Action Report	Strategic Partner	Barbara Finn; Strategic Partner			Email	First Amendment Privilege	Confidential communication regarding the associational plans or strategies of Plaintiff Finn and allied association(s) regarding redistricting and voting in MS.
FinnB_0000002	8/12/2023	Attachment to "Revised Report from the Political Action Report"	2023 Primary ElectionSummary8.pdf	Strategic Partner	Barbara Finn; Strategic Partner			PDF	First Amendment Privilege	Confidential communication regarding the associational plans or strategies of Plaintiff Finn and allied association(s) regarding redistricting and voting in MS.
FinnB_0000003	8/12/2023	Attachment to "Revised Report from the Political Action Report"	August 2023 Revised Report of the [Redacted to preserve First Amendment privilege]	Strategic Partner	Barbara Finn; Strategic Partner			.docx	First Amendment Privilege	Confidential communication regarding the associational plans or strategies of Plaintiff Finn and allied association(s) regarding redistricting and voting in MS.